

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE STATE OF NEW YORK EX REL  
VINOD KHURANA and THE CITY  
OF NEW YORK EX REL VINOD KHURANA,

Plaintiffs,

v. Case No.  
15-CIV-06605-JFK

SPHERION CORP.  
(n/k/a SFN GROUP, INC.),

Defendant.  
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VIDEO-RECORDED DEPOSITION OF  
LAKSHMANAREKHA BASU, a Witness herein,  
taken by Defendant, pursuant to Subpeona,  
at the offices of Bartlett LLP, 170 Old  
Country Road, Mineola, New York, on  
Monday, November 12, 2018, at 9:23 a.m.,  
before Debra Stevens, a Certified Realtime  
and Registered Professional Reporter and  
Notary Public within and for the State of  
New York.

1 L. Basu

2 A. We were on the same QA team,  
3 yes.

4 Q. So what was your understanding  
5 of his qualifications?

6 A. Of CityTime?

7 Q. What were his qualifications to  
8 do the work he did?

9 A. That question, to me, is like --  
10 it's too broad because CityTime is an  
11 application and if you are asking what is  
12 his qualification on CityTime, it depends  
13 on how many years he has spent on the  
14 application, which I do not know.

15 Q. You don't have any sense of what  
16 kind of quality of a worker he was?

17 A. Oh, okay. So, how much -- how  
18 good quality testing can he do?

19 Q. Yes.

20 A. Oh, okay. I think he is pretty  
21 good.

22 Q. Better than you?

23 A. I do not know. I do not  
24 remember.

25 Q. Did he ever tell you he was

1 L. Basu

2 like that.

3 Q. Do you have any memory of  
4 telling Mr. Mazer that Mr. Berger --  
5 sorry. Withdraw the question.

6 Did you ever have a conversation  
7 with Mr. Mazer that Mr. Khurana wasn't  
8 doing a good job?

9 A. I never talked to Mazer, Mark  
10 Mazer.

11 Q. Were you ever frustrated with  
12 Mr. Khurana for not coming in on time?

13 A. No.

14 Q. Are you sure?

15 A. I don't remember anything like  
16 that.

17 Q. Was it your understanding that  
18 Mahesh was unhappy with Mr. Khurana for  
19 not coming in on time?

20 A. I don't remember anything like  
21 that.

22 Q. Did some people work overtime on  
23 the CityTime project?

24 A. Most of us were required to do  
25 overtime to finish the releases. That's

1 L. Basu

2 Q. Would it have been bothered you?

3 A. If I have to come in early but  
4 other people are coming late, if it would  
5 bother me?

6 Q. No, that is not the question.  
7 The question is, if someone worked very  
8 late on overtime the night before and they  
9 came in a little late, would that be a  
10 problem?

11 A. No.

12 Q. Were people fired for being  
13 late?

14 A. I don't know.

15 Q. Do you have any recollection of  
16 someone being fired for being late?

17 A. In any of my jobs?

18 Q. No. In the CityTime project.

19 A. I don't know.

20 Q. Do you have any recollection of  
21 Mr. Khurana being fired for being late?

22 A. No.

23 Q. Was it your understanding that  
24 Mr. Khurana was a hard worker?

25 A. He was a good guy. That's how I

1 L. Basu

2 Q. So you don't recall Goldman  
3 Sachs or someone from Goldman Sachs ever  
4 reaching out to you?

5 A. No.

6 MR. WEXLER: Nothing further.

7 MR. KOVEL: I think we are done.

8 Thank you.

9 THE VIDEOGRAPHER: This is the  
10 end of today's deposition. The time  
11 is 11:24. We are off the record.

12 [TIME NOTED: 11:24 a.m.]

13  
14 \_\_\_\_\_  
LAKSHMANAREKHA BASU

15  
16 \_\_\_\_\_  
Subscribed and sworn to

17 Before me this \_\_\_\_\_

18 Day of \_\_\_\_\_, 2018.

19  
20  
21 \_\_\_\_\_  
Notary Public

## CERTIFICATION

I, DEBRA STEVENS, a Notary Public for  
and within the State of New York, do  
hereby certify:

That the witness whose testimony as  
herein set forth, was duly sworn by me;  
and that the within transcript is a true  
record of the testimony given by said  
witness.

I further certify that I am not  
related to any of the parties to this  
action by blood or marriage, and that I am  
in no way interested in the outcome of  
this matter.

IN WITNESS WHEREOF, I have hereunto  
set my hand this 20th day of November,  
2018.

*Debra Stevens*

DEBRA STEVENS, RPR-CRR

\* \* \*

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